

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

GFI MANAGEMENT SERVICES INC.,  
GFI HOSPITALITY LLC, GFI  
DEVELOPMENT COMPANY LLC, GFI  
CAPITAL RESOURCES GROUP INC., AND  
BROADWAY CONSTRUCTION GROUP  
LLC,

Plaintiffs,

v.

UNITED STATES SMALL BUSINESS  
ADMINISTRATION; AND KELLY  
LOEFFLER, Administrator of the UNITED  
STATES SMALL BUSINESS  
ADMINISTRATION,

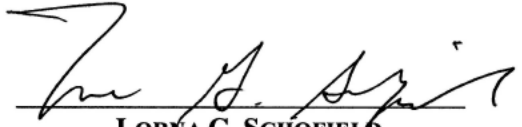
Defendants.

Case No. 24-cv-09317-LGS

**NOTICE OF MOTION TO SEAL**

The application to seal the Administrative Record at Dkt. 24 is provisionally **GRANTED**. The seal on certain parts of the Administrative Record may be lifted if the Court finds, upon adjudication of the merits, that the public's right to access so requires. So Ordered.

Dated: March 28, 2025  
New York, New York

  
**LORNA G. SCHOFIELD**  
UNITED STATES DISTRICT JUDGE

**PLEASE TAKE NOTICE** that the above-named Plaintiffs, GFI Management Services Inc., GFI Hospitality LLC, GFI Development Company LLC, GFI Capital Resources Group Inc., and Broadway Construction Group LLC (collectively “**Plaintiffs**”), by and through their attorneys, Greenberg Traurig, LLP, moves—with the consent of Defendants the U.S. Small Business Administration (“SBA”) and SBA Administrator Kelly Loeffler (together the “**Government**”)—to permit the Government to file the Administrative Record in this matter under seal.

**PLEASE TAKE FURTHER NOTICE** that the Government has, pursuant to the Court’s Individual Rules and Procedures for Civil Cases, Rule I.D.3, filed the complete Administrative Record, which consists of approximately 36,000 pages, on the Court’s Electronic Case Files (“ECF”) system under seal.

**PLEASE TAKE FURTHER NOTICE** that in support of this Motion, Plaintiffs rely on: (1) the accompanying Memorandum of Law in Support of Plaintiffs' Unopposed Motion for Leave to File Administrative Record Under Seal; and (2) the accompanying Declaration of Daniel P. Filor (and **Exhibit A** attached thereto).

DATED: March 25, 2025

Respectfully submitted,

GREENBERG TRAURIG, LLP

By: /s/ Daniel P. Filor  
DANIEL P. FILOR  
CHARLES J. BERK  
One Vanderbilt Avenue  
New York, New York 10017  
Telephone: (212) 801-9200  
Email: filord@gtlaw.com  
berkc@gtlaw.com

KIMBERLY S. MELLO  
(*pro hac vice*)  
450 S. Orange Ave., Ste. 650  
Orlando, FL 32801  
Telephone: (407) 418-2402  
Email: mellok@gtlaw.com

*Counsel for Plaintiffs*